

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

**CANDACE MULL, INDIVIDUALLY and
AS NEXT OF KIN FOR JIZAYA MULL**

PLAINTIFF

V.

NO. 2:06-cv-2157

**GRACO CHILDREN'S PRODUCTS, INC.,
JOHN DOE NUMBER ONE, and
JOHN DOE NUMBER TWO**

DEFENDANTS

**NOTICE OF THE VIDEO DEPOSITION DUCES TECUM
OF KRIS SPERRY**

PLEASE TAKE NOTICE that on August 9, 2007, beginning at 2:00 p.m., Plaintiffs in the above-styled cause will take the deposition of Kris Sperry. The deposition will be held at the offices of Schiff Hardin, 6600 Sears Tower, Chicago, IL 60606. The deposition will be taken by sound, visual, and stenographic means before an official court reporter or some other officer duly authorized by law to take depositions and will continue from day to day until completed. The deposition will be taken for the purposes of discovery, for use at trial, and for all other uses permitted under the Federal Rules of Civil Procedure.

DUCES TECUM

The deponent is to bring the following documents and or tangible items identified on the attached Exhibit A to the deposition.

Respectfully Submitted,

BY: s/Phillip Duncan
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CERTIFICATE OF SERVICE

I have served the above and foregoing Notice of Deposition upon Graco Children's Products, Inc. by e-mail and U. S. Mail, with proper postage affixed this 26th day of July, 2007, to its attorneys of record:

B. J. Wade, Esq.
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ATTORNEYS FOR GRACO CHILDREN'S PRODUCTS, INC.

s/Phillip Duncan
Phillip J. Duncan

EXHIBIT A

The witness shall bring to this scheduled deposition the following document and tangible things:

1. Any and all reports, inspection reports or logs, analyses, notes, memoranda, photographs, drawings, videotapes, recordings, literature, catalogs, manuals, records, brochures, standards, regulations, reference works of any kind, and all other such materials used or in any way referred to or prepared by you in connection with your work on this case.
2. Produce copies of all correspondence, reports, notes and other documents between your office and any attorney or other person claiming to represent Defendants.
3. Any and all materials, tangible items, and documents of any kind which you have received or gathered from Defendants, Defendants' attorneys, or any other person claiming to represent Defendants or their attorneys.
4. Any and all reports, memoranda, photographs, literature, videotapes, recordings, drawings and documents, foreign or domestic, of any kind, prepared by you or used by you in connection with your work in this case.
5. A list of all cases in which you have been retained to offer an expert opinion or evaluation within the last five (5) years.
6. A list of all cases in which you have given either a deposition or testified live or by videotape at trial within the last five (5) years.
7. Copies of all bills, invoices, or similar documents reflecting the money which has been charged by you or paid to you in connection with any work that you have done or intend to do with this case.

8. A complete and accurate copy of your resume or curriculum vitae, including a list of publications authored by you within the last five (5) and a copy of same.